

**Update to the Kittiwake Letter of Application from the Cayman Islands
Department of Transportation, MARAD, dated November 5th, 2006
Update December 21st, 2007**

May 1, 2007

This document is an update to the Kittiwake Reefing Plan and application to MARAD for the donation/transfer of a ship for artificial reefing purposes to the Cayman Islands.

**Kittiwake Paint Test Results: Original Batch of 121 Samples
May 17, 2006
Universal Laboratories, Hampton, VA**

Of the 121 paint samples that were taken on the Kittiwake from the above reference paint sampling batch, 106 of the samples show no Aroclor 1262 registered, 14 of the samples show Arcolor 1262 contents of acceptable limits of between 1.0 and 19.0ppm, with the majority in ranges of 1.0 to 3.0ppm.

One sample indicated a concentration level of 108ppm of Arcolor 1262. This is referred to Sample #67. The sample was taken on the overhead, main propulsion, lower starboard side B-204-E Frame 79. The sample was white paint. Of the 121 samples taken, there were a total of 35 samples that were white paint, with none of the other white paint samples showed any Arcolor 1262. Other white paint samples were taken from the fan room, interior bulkheads, shaft alley, diving bulkhead, recompression chamber and overhead, bulkhead in welding, forward bulkhead including distribution compressor, lower main engine room, air compressor room, lower storeroom, electronics storeroom, bosuns lockers, overhead above the generator sets, overhead main propulsion, sonar room and main propulsion room. All white paint, including sample #67 is common, standard Navy white paint (150 or 151).

There were 10 paint samples from the main propulsion area, 1 foot from the hot sample area, 5 feet from the hot sample area, 8 feet from the hot sample area, 15 feet from the hot sample area, and continuing from there. All paint was of like color paint, and all other samples came up negative, with the highest concentration of PCB being 19 ppm. This makes the one sample (#67) an exception. Photo documentation is available on all samples taken.

**Kittiwake Paint Test results: Second Batch of 2 samples
April 10, 2007
Severn Trent STL, Pittsburg, PA**

Due to the concentration of Arcolor 1262 found in Batch 1 sample #67, a second batch of paint samples were taken in the same vicinity as sample #67 was found. The results of both of these samples (001 and 002 - lab report attached) shows an even higher concentration level of Arcolor 1262 of 3,400,000 ug/kg (equivalent to 3,400ppm). This data would indicate that the original sample #67 was at the outskirts or edge of the contaminated area, and that the second batch of re-sampling has found the core of the contaminated area.

Proposed plan for remediation:

As these two most recent samples were just an expanded sampling of the same site as sample #67 from the original batch (enlarged sample), we have obviously sampled right into the real hot spot. Since we have already sampled all around this area, that being the overhead, main propulsion, lower starboard side B-204-E Frame 79 and surrounding area, we know that the area is very limited in size.

As noted above, the type and color of paint (white) that was sampled is the typical paint used throughout the ship, and there were not any other concentrations of Arcolor 1262

pcb's in the white or any other color paint. This would indicate that it is an isolated hot spot and we would speculate that this contamination was most likely caused by some form of leaching of something that has since been removed, rather than being inherent in the original paint itself. We speculate, as an educated guess, that there was something on the deck above, that would have dripped down and pooled on the beam from above as it is not a sealed deck above. The other probability would be the piping right next to the contaminated area. There is a union (a fitting that connects two pieces of pipe together) right next to the hot area, that could have been spraying or leaking onto the beam. Also, there is an older generator (3-268A Cleveland) that were notoriously leaky that is in parts on the deck above, which could have been a potential contamination source for the beam below. We sampled the paint directly adjacent to the generator and found no contamination that exists at this time. We offer this dialogue as potential causes for the contamination area.

Our remediation plan is to remove all metal and paint (everything) from the affected area, instead of just removing the paint. The effected area is in the engine room, on the underside of the deck, between the upper and lower engine room. The area is on the starboard side within the watertight space, but does not make up any part of the watertight shell, and removing the steel from this area would simply be a diver penetration or access and not affect the ship's water-tight integrity for towage or sinking. We have sampled the affected paint area until a clean or non-contaminated area in a 360 degree circumference of the contaminated area is found. We will remove all paint in this area making a clean margin, and then using a plasma cutter, we will cut out the metals and steel and dispose of the paint and steel as PCB contaminated materials.

Following remediation, Environmental Profiles (EPI) will perform the third party inspection, re-sampling and reporting on the effectiveness of the remediation plan.

Copies of all future lab analysis from the above paint sampling will be provided to the CI DOE, MARAD and the US EPA.

Yours truly;
Cayman Islands Tourism Association (CITA)

A handwritten signature in dark ink, appearing to read "N. Easterbrook", is written over a light blue rectangular background.

Nancy Easterbrook
Kittiwake Project Manager
1 345 946-5658



Kittiwake Paint Sample #67 – PCB Contamination area on the overhead